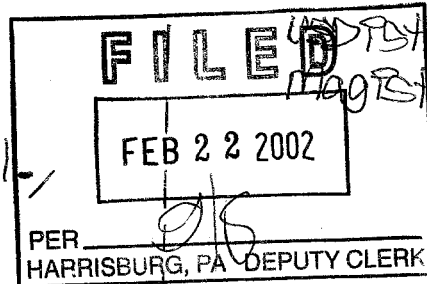


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,
Plaintiff,

vs.

KENNETH D. KYLER, et al.,
Defendants.



MOTION FOR ENLARGEMENT OF TIME

Comes Now, the Plaintiff & Pro Se Counsel, John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Law & Legal Procedures within the United States, pursuant to Fed. R. Civ. P. 6(b), and now files his motion for Enlargement of Time, herein the above-captioned case, & why avers, deposes & states

1. That, on February 6, 2002, U.S. Magistrate Judge J. Andrew Smyse of this Court, filed his Report And Recommendation, herein this case.

2. That, due to the fact that the Plaintiff has not yet completed his necessary legal research and investigation that he needs to do in order to enable him to prepare & file & serve his Plaintiff's written objections to the U.S. Magistrate Judge's Report And Recommendation herein this case nor has he yet had the time to make the necessary copies of such document, the Plaintiff is unable to prepare, file & serve his written objections to the U.S. Magistrate Judge's Report And Recommendation of February 6, 2002, by the due date for such of February 11, 2002, he requests an enlargement of time of (a) twenty-one days to & including March 11, 2002, in which to prepare, file & serve his Plaintiff's written objections to the U.S. Magistrate Judge's Report And Recommendation of February 6, 2002, herein this case.

3. That, this short period of enlargement of time will not prejudice Defendants nor unduly delay the proceedings, herein this case.

(W) HEREFORE, Plaintiff John Richard Jae, prays that this Court will grant him the requested enlargement of time in full, herein this case.

AND HE SHALL EVER PRAY
RESPECTFULLY SUBMITTED

Dated: 18th FEBRUARY 2002:

(S) John Richard Jae
MR. JOHN RICHARD JAE, #166-3
SCT. GREENE COUNTY
THE PENNSYLVANIA BAR

DAVE V. S. KYLER, ET AL.
CRIMINAL - 13 CR 000315
CERTIFICATE OF SERVICE

I CERTIFY under penalty of perjury that on 2-19-02, I mailed to the person listed below, a true and correct copy of the written Motion for Enlargement of Time, by way of U.S. First Class Mail, postage pre paid & addressed to:

MR. MICHAEL L. HARVEY, SDAG
Office of the Attorney General of Pennsylvania
18th Floor - Strawberry Square
Harrisburg, PA - 17120

I CERTIFY under penalty of perjury that on 2-19-02, I gave Prison Officials here for mailing to this Court, the original of the above-same document.

Dated/Executed on:
19th FEBRUARY 2002:
At: Waynesburg, Pennsylvania-

(S) John Richard D.
MR. JOHN RICHARD D.
#BQ-3219
201- GREENE/SM
175 PROGRESS DRIVE
Waynesburg, PA 15370
Plaintiff and Pro Se Ca

From The Desk of:
MR. John Richardson,
#BQ-3219
Sgt-Greene/SMU
175 Progress Drive
Waynesburg, PA. 15370-8029
February 19, 2002

To: Office of the Clerk
U.S. District Court
228 Walnut Street
P.O. Box 983
Harrisburg, PA. 17108-0983

Re: JAE vs. Kyle, et al.
Crim No. 1:00-cr-00-0215

Dear Clerk:

Please file the enclosed Plaintiff's motion for Entry
of Time in the above-captioned CRIM Rights Action:

Also, please be advise that Plaintiff current address
of record is as listed above and that all court orders, ect.
shall now be forwarded to this Plaintiff at such address

~~_____~~

Sincerely,

(s) John Richard Jae
MR. JOHN RICHARD JAE
Plaintiff and his Counsel

CC: MR. Michael L. Harvey-DAG,
WJ/END.